

**Shawn K. Brown
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COUNSEL FOR THE CHAPTER 7 TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

IN RE: §
ROBERT WILLIAM RAYNES JR. §
BETTY SUE RAYNES §
DEBTORS §

Case No. 09-70033-HDH-7

CHAPTER 7

**APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT
OF REAL ESTATE BROKER FOR THE TRUSTEE**

TO THE HONORABLE HARLIN D. HALE, U. S. BANKRUPTCY JUDGE:

COMES NOW, Shawn K. Brown, Chapter 7 Trustee in the above-styled and numbered cause, and pursuant to 11 U.S.C. §327 files this his Application for Order Authorizing Employment of Real Estate Broker for the Trustee (“Application”), requesting the Court to enter an order authorizing the Trustee to employ the firm of McGregor Real Estate Group as Real Estate Broker for the Trustee, and in support thereof, would respectfully show unto the Court:

1. On or about 01/30/09, the Debtors filed a Voluntary Petition for relief under Chapter 7 of the United States Bankruptcy Code. Shawn K. Brown was appointed chapter 7 trustee. The Trustee filed his no asset report and the case was closed on June 9, 2009.

2. The Debtors filed a motion to reopen the case on August 13, 2009. An order was entered on September 1, 2009 and the case was reopened. By order entered on September 22, 2009 Shawn K. Brown was reappointed as chapter 7 trustee.

3. The Trustee desires to employ McGregor Real Estate Group as Real Estate Broker under a Farm and Ranch Real Estate Listing Agreement (“Listing Agreement”) for purposes of the marketing and sale of real property described as approximately 126.69 acres of real property on FM 1720, Haskell County, Texas (the “Property”). Such Listing Agreement is attached hereto as an exhibit. The Listing Agreement provides for a payment of a real estate commission equal to 6% of the purchase price of a Court approved sale of the Property, to be paid at closing solely from the proceeds of the sale. The Trustee will seek approval of the payment of such commission when he seeks approval of the sale of the property. It is not contemplated that any other fee application will be filed concerning the brokerage commission. The Trustee desires to employ Broker for a period of six months. The Listing Agreement can be extended in writing by the Trustee for additional six month periods without further Court approval.

4. The Trustee has chosen McGregor Real Estate Group because it is an experienced real estate broker and has performed these services in the past.

5. Pursuant to Bankruptcy Rule 2014(a), the Affidavit of Bill McGregor is attached hereto as an exhibit. Except as may be stated herein and in the affidavit, Applicant’s owners, associates, representatives and agents, to the best of Trustee’s knowledge, do not have any connection with the Trustee, the Debtors, its creditors, or any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee.

6. McGregor Real Estate Group, to the best of the Trustee's knowledge, does not hold or represent any interest adverse to the Trustee, the Debtors or the estate, in the matters upon which said broker is to be engaged.

7. The Trustee asserts that employment of McGregor Real Estate Group as Trustee's Real Estate Broker will be beneficial to this estate.

WHEREFORE, PREMISES CONSIDERED, the Trustee respectfully prays that he be authorized to employ McGregor Real Estate Group as Real Estate Broker, and pay any commissions due pursuant to a Court approved sale of the Property, and for general relief.

Respectfully submitted,

WRIGHT GINSBERG BRUSILOW P.C.

/s/ Shawn K. Brown
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COUNSEL FOR THE CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Application for Order Authorizing Employment of Real Estate Broker for the Trustee was served upon the Debtors, Debtors' counsel, the United States Trustee, and upon those parties requesting service, via electronic service or by First Class United States Mail, postage prepaid, as applicable, on this 16th day of December, 2009.

/s/ Shawn K. Brown